
**Review Comments on Golder's
Response to Comments
for the
Chemical Recycling, Inc. Facility
2006 Site Investigation Report**



**Prepared for
U.S. Environmental Protection Agency
Region 6**

Prepared by

**Dynamac Corporation
Superfund Technical Assessment and Response Team III (START)**

Contract No. EP-W-06-077

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**DYNAMAC
CORPORATION**

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Document: 2006 Site Investigation Report – Chemical Recycling Inc.

EPA Comments

General Comments:

Comments adequately addressed by Golder.

Soils:

1. *Original EPA Comment: Soils analytical results for metals from the Experimental Roads reveals metals contamination of mercury, lead, and zinc. Contamination is detected from surface interval down to 18" interval depths. Trichloroethene was also detected at several locations along the road down to 24" in depth. Any removal plan developed for the road should consider excavation to 24" with confirmation samples to confirm total removal below applicable site action levels.*

Golder's Response. The majority of the samples with metal concentrations above the respective PCLs are from samples collected from the 0 – 6 inch sample interval, with some metal exceedances in samples collected from the 12 – 18 inch interval. Excavation limits for the Experimental Roads to be included in future removal plan will be based on sample results from the 2006 Site Investigation and from confirmation sample results.

Comment to Golder Response: Golder does not specifically address the point regarding trichloroethene detected along the Experimental Road in their response but states that excavations along the road will be addressed in the removal excavation plan and through confirmation samples. We believe that specific attention should be given to this issue once the removal plan is submitted to EPA to ensure the trichloroethene is address properly.

EPA Comment No. 2, adequately addressed by Golder.

Groundwater:

EPA Comments No 1 through No. 3 adequately addressed by Golder.

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TCEQ Comments

1. Comment No. 2 deals with appropriate screening level for soil. TCEQ's comment recommends using a 30 acre source area. Golder's response argues for the use of a 0.5 acre source. Golder provides supporting arguments for the 0.5 acre source in the comment.
2. Comment No. 5 addresses the delineation of horizontal extent of soil contamination. TCEQ claims it has not been delineated; Golder states it will be determined during the removal action through the use of verification samples taken from the side walls of the excavation. Once Golder submits the removal plan, a review of proposed confirmation sampling techniques should be conducted to ensure proper verification sampling is proposed.

EPA and TCEQ considerations

Per EPA's request Dynamac reviewed both sets of comments to identify any areas needing special attention from both agencies.

One issue was identified for consideration. There appears to be some disagreement between Golder and TCEQ about which PCL to use for the soil action level. This may affect the soil excavation and confirmation sampling activities. See TCEQ Comments above, Comment No. 2.